

Gravatt, Dan

From: Gravatt, Dan
Sent: Friday, May 09, 2014 8:32 AM
To: Carey, Curtis; Peterson, Mary
Cc: Field, Jeff; Tapia, Cecilia; Hammerschmidt, Ron
Subject: RE: Errors in MCE's latest West Lake Newsletter (FW: EPA Testing For Offsite Radiation at West Lake)

Quotes from MCE's letter with errors identified:

1. "EPA Region 7, while originally pushing back against AG Koster's request, decided yesterday to test the Bridgeton Municipal Athletic Complex after a group of concerned citizens found elevated levels of radioactivity."

Even if we ignore the data quality and usability issues with the information Just Moms provided us and take their laboratory results at face value, the highest concentration of gamma-emitting radionuclides (including EVERYTHING that emits gammas, not just U, Th, Ra) in any of their soil samples works out to 5.13 pCi/g. For reference, the cleanup standard in the SFS for Th and Ra was set at 5 pCi/g plus background. So, the "concerned citizens" did NOT find elevated levels of radioactivity.

2. Under "USGS takeaways, they say "Dr. Criss is correct in stating there is more than "leached barium sulfate" at the West Lake Landfill. EPA Region 7 based its 2008 Record of Decision on the only reported radioactive wastes at the site being leached barium sulfate (pdf pg. 14)."

This is not what USGS said. They actually said, in part, "Although the author may be correct that the majority of the radioactive material (RIM) is not barium sulfate or barite, in reports on the site there are only a few poorly documented chemical analyses compared to the hundreds of radiological measurements, so it is difficult to substantiate the author's statement that longstanding assertions indicating that barium sulfate is an important component of the radioactive wastes at the site is somehow contrary to chemical and physical data ." Also, EPA previously commented on this issue in a letter to MCE dated July 26, 2013 that predated the USGS evaluation of Criss' "report".

3. "The financially responsible parties contractor, EMSI, improperly identified the speed of groundwater flow,..."

Actually, USGS identifies a number of errors or potential errors both with EMSI's estimates of groundwater flow velocity in its 2012 groundwater report and with Criss' interpretations of that velocity data in his "report".

4. "USGS agrees with Dr. Criss that nearby offsite groundwater monitoring is needed to determine if leachate and radioactivity has migrated offsite. "

This statement makes it sound like the first time we've acknowledged this need. Actually, EPA has been saying that we'll do this for quite a while. OSRTI's memo to the Region of May 21, 2009 recommends additional groundwater monitoring locations both on- and off-site.

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Principles and integrity are expensive, but they are among the very few things worth having.

From: Carey, Curtis
Sent: Friday, May 09, 2014 6:39 AM
To: Gravatt, Dan; Peterson, Mary
Cc: Field, Jeff; Tapia, Cecilia; Hammerschmidt, Ron
Subject: Re: Errors in MCE's latest West Lake Newsletter (FW: EPA Testing For Offsite Radiation at West Lake)

Dan,

If you could point out the errors for me that would be helpful. No citations needed at this point just a tally of the errors. Based on that I can assess whether we might want to correct the record. If we do and KB approves we would need to have a well-sourced response.

From: Gravatt, Dan
Sent: Friday, May 9, 2014 7:34:03 AM
To: Carey, Curtis; Peterson, Mary
Cc: Field, Jeff; Tapia, Cecilia; Hammerschmidt, Ron
Subject: Errors in MCE's latest West Lake Newsletter (FW: EPA Testing For Offsite Radiation at West Lake)

This issue of MCE's newsletter is full of errors. Do we plan to rebut?

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Principles and integrity are expensive, but they are among the very few things worth having.

From: MO Coalition for the Environment [<mailto:moenviron@moenviron.org>]
Sent: Thursday, May 08, 2014 12:49 PM
To: Gravatt, Dan
Subject: EPA Testing For Offsite Radiation at West Lake



West Lake Landfill Newsletter

EPA Region 7 Testing Offsite

May 8, 2014

Quick Links...

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Greetings!

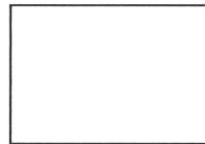
There is a lot happening at the smoldering and radioactive West Lake Landfill in Bridgeton, Missouri. MCE continues to advocate for the transfer of the West Lake Landfill to the St. Louis Army Corps of Engineers Formerly Utilized Sites Remedial Action Program (FUSRAP).

The St. Louis Army Corps FUSRAP has safely removed and transported over 1,000,000 cubic yards of nuclear weapons related material to government sanctioned facilities. The radioactive wastes at West Lake are the same currently being handled, with great success, by the St. Louis Army Corps FUSRAP.

The St. Charles County Council is the most recent local government to support a resolution calling on our federally elected officials to put the St. Louis Corps of Engineers FUSRAP in charge of the West Lake Landfill. St. Louis County and the City of Bridgeton also passed similar resolutions this year.

AG Koster Takes Action - EPA Listens

On April 29, 2014, Attorney General Chris Koster requested EPA Region 7 perform offsite testing for radioactive wastes around the West Lake Landfill.



AG Koster also filed a motion in St.

Louis County to take the landfill owner, Republic Services, back to Court. MCE applauds AG Koster's efforts on both fronts. EPA Region 7, while originally pushing back against AG Koster's request, decided yesterday to test the Bridgeton Municipal Athletic Complex after a group of concerned citizens found elevated levels of radioactivity.

USGS Review Contradicts EPA Claims

MCE received a United States Geological Survey report sent to EPA Region 7 last November. The

USGS reviews a report by Dr. Bob Criss of Washington University and groundwater reports by the financially responsible parties contractor, EMSI, which you can find on the EPA website under site documents.

USGS takeaways include:

Dr. Criss is correct in stating there is more than "leached barium sulfate" at the West Lake Landfill. EPA Region 7 based its 2008 Record of Decision on the only reported radioactive wastes at the site being leached barium sulfate (pdf pg. 14). The USGS report (pg. 2) says, "It is unlikely the 8,700 tons were BaSO₄ (barium sulfate) but most likely were a mixture of waste that included BaSO₄." MCE is concerned EPA Region 7 is making decisions based on inaccurate assumptions and incomplete information.

The financially responsible parties contractor, EMSI, improperly identified the speed of groundwater flow, background radiation levels, and aquifer located below the West Lake Landfill. USGS agrees with Dr. Criss that nearby offsite groundwater monitoring is needed to determine if leachate and radioactivity has migrated offsite.

EPA Updates On Fire Barrier

EPA Region 7 has entered into an agreement with the financially responsible parties at the landfill on "preconstruction work" in order to create a barrier separating the radioactive wastes from the ongoing smoldering fire. Efforts have been stalled for several months due to finding previously unidentified radioactive materials along the originally proposed barrier line. EPA Region 7 has maintained at several public meetings that no radioactive material will be moved or impacted by the construction of the fire barrier.

EPA Region 7 recently contracted the Kansas City Corps of Engineers to help oversee the fire barrier work.

Upcoming Events

Midland Township Democratic Committee panel discussion on the West Lake Landfill.

Where: Indian Hills Library, 8400 Delport Dr, Overland, MO 63114.

When: Thursday, May 8, 2014 from 7:00-8:30pm.

Franciscan Sisters of Mary Prayer Vigil

Where: 12755 St. Charles Rock Road in Bridgeton, MO at the abandoned Phillips 66 gas station.

When: Every 2nd & 4th Wednesday of the month (weather pending). May 14th & 28th this month.

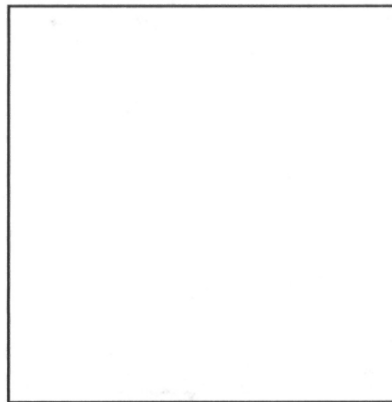
West Lake Landfill Community Meeting

Where: International Union of Operating Engineers Local 513 at 3449 Hollenburg Drive, Bridgeton, MO 63044.

When: Thursday, May 15, 2014 from 6:00-8:00pm.

Take Action

Senator Blunt, Senator McCaskill, Congressman Clay, and Congresswoman Wagner all have the power to transfer the West Lake Landfill to the St. Louis Army Corps of Engineers FUSRAP by introducing and passing legislation. This action has been done by Democrats and Republicans alike in previous years and we call on them for a bipartisan effort to do the same here.



We appreciate their letter of support for the St. Louis Corps of Engineers FUSRAP involvement at the West Lake Landfill and it's time to go further. Call and ask them to put the St. Louis Corps FUSRAP in charge at West Lake now!

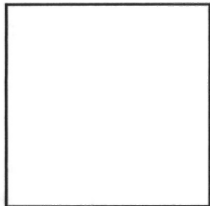
Senator Blunt: 202-224-5721

Senator McCaskill: 202-224-6154

Congressman Clay: 202-225-2406

Congresswoman Wagner: 202-225-1621

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